

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

**MAR 12 2020**

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY D. WILLIAMS,

Defendant.

**4:20CR192 RLW/JMB**

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

At all times pertinent to the charges in this Indictment:

1. Federal law defined the term:

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(a));

(b) "sexually explicit conduct" to mean actual or simulated

(i) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal,

whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the anus, genitals or pubic area of any person

(18 U.S.C. § 2256(2)(A)); and

(c) “computer” to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6)).

2. The “Internet” was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about September 1, 2019 and March 4, 2020, in Franklin County, Missouri within the Eastern District of Missouri and elsewhere,

**JEFFREY D. WILLIAMS,**

the defendant herein, did use any facility and means of interstate commerce, and did knowingly attempt to persuade, induce, entice and coerce a minor under the age of eighteen, to engage in sexual activity for which any person could be charged with a criminal offense, to wit: the defendant, who was at least twenty-one years of age, communicated via the internet with Federal Bureau of Investigation Special Agent Belt, who the defendant believed to be an adult woman providing an opportunity for sexual activity with her fourteen-year old daughter, and attempted to persuade, induce, entice and coerce such daughter, who the defendant believed was a minor under the age of seventeen, to engage in sexual activity, in violation of Missouri Revised Statutes Sections 566.034 (statutory rape in the second degree), 566.064 (statutory sodomy in the second

degree), 566.071 (child molestation in the fourth degree) and 566.083 (sexual misconduct involving a child),  
in violation of Title 18 United States Code Section 2422(b).

A TRUE BILL.

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FOREPERSON

JEFFREY B JENSEN  
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